



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 25 2014

REPLY TO THE ATTENTION OF:

Mr. Matthew Stuckey
Chief
Permits Branch
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

Dear Mr. Stuckey:

The U.S. Environmental Protection Agency has reviewed the draft significant permit modification, permit number 051-34614-00013, for Duke Energy - Gibson Generating Station, located in Owensville, Indiana. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1. Several conditions in the draft permit establish the use of Particulate Matter (PM) Continuous Emissions Monitoring System (CEMS) as the specific means of determining compliance with opacity limits. While the use of PM CEMS in lieu of a continuous opacity monitoring system is consistent with 326 IAC 3-5-1(c), permit language that prescribes one specific method for establishing compliance may interfere with the use of any credible evidence to demonstrate compliance. The permit conditions of concern are C.2(c), C.2(d), D.1.8(d)(2), D.2.8(d)(2), D.3.8(d)(2), D.4.9(d)(2), and D.5.9(d)(2). The draft permit language should be revised such that it does not conflict with the use of any credible evidence to demonstrate compliance.
2. Permit conditions D.1.11(b), D.2.11(b), D.3.11(b), D.4.11(b), and D.5.12(b) provide an exception of PM CEMS data obtained during periods of startup, shutdown, and malfunction. The PM best available control technology emission limits for Units 1 through 5, however, apply at all times of operation. The permit should not exclude PM CEMS data obtained during periods of startup, shutdown, and malfunction.
3. In addition to 40 CFR Part 60, Appendix B, Performance Specification #11, which is cited in permit conditions D.1.11, D.2.11, D.3.11, D.4.11, and D.5.12, the permit should also reference 40 CFR 60.13(e) regarding the operation of PM CEMS.

4. The Technical Support Document should include all pending enforcement actions under the "enforcement issues" section.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Sam Portanova, of my staff, at (312) 886-3189.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico". The signature is written in black ink and is positioned above the printed name and title.

Genevieve Damico
Chief
Air Permits Section